



CINCINNATI BELL LONG DISTANCE

EX PARTE OR LATE FILED

CBLD CENTER, 36 EAST SEVENTH STREET, SUITE 2300 • CINCINNATI, OHIO 45020-2157
GENERAL OFFICES...513-369-2140

Received

DEC 29 1998

Common Carrier Bureau
Network Service Division
Office of the Chief

November 30, 1998

Federal Communications Commission
Common Carrier Bureau
Network Services Division

Re: November 24 FCC letter regarding RespOrg non-compliance

RECEIVED

MAR - 3 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Sir/Madam:

In response to the FCC November 24, 1998 letter regarding RespOrg non-compliance with the Set-aside 888 number right-of-first-refusal process, I submit this information for the record.

On August 14, 1998, CBLD notified customers for whom we are the RespOrg of their right-of-first-refusal. This was done via mail (copy attached). Between that date and October 30, 1998, CBLD collected the returns and processed them per the instructions in a June 1, 1998 letter from the SMS/800 Management team (copy attached).

On November 12, 1998, CBLD provided SMS/800 with all required information for those customers not responding to the August 14 right-of-first-refusal letter. The final statistics are as follows:

Total Customers contacted: 1186 (August 14, 1998 letter)
Total Returned Letters: 591 (50% return rate)
Customers failing to respond: 595 (50%)

According to our records, we have processed 100% of the 888 numbers for which we were identified as the RespOrg.

Sincerely,

Andrew Ferrigno

Andrew Ferrigno
CBLD Market Manager

No. of Copies rec'd 041
List ABCDE

Enclosures

CBLD
36 E. 7th Street, Suite 2300
Cincinnati, OH 45202
Attn: Andrew Ferrigno

Cincinnati Bell Long Distance

November 12, 1998

SMS/800 Help Desk
1721 South Sykes Street
Bismarck, ND 58504

The purpose of this letter is to inform you of what CBLD has done to gain vanity number documentation and to give SMS the customers that were contacted, but failed to respond. On August 14, 1998 each customer with a vanity "888" number was mailed a letter (see attached) explaining the subscription process and informing them of where to send the completed letters. Once CBLD received the completed letters, we placed them in a database and sent the letters and database information to SMS. This process was completed on October 30, 1998.

The customers I am now sending have been contacted by mail, but failed to respond to the letter. In accordance with your guidelines, CBLD is providing you with all of the customer information you requested. If you have any questions, please call me at 513-357-5645.

Sincerely,



Andrew Ferrigno
Marketing Manager

account name
address
city, state, zip

August 20, 1998

Dear CBLD Customer:

As a CBLD Toll-Free subscriber, you have been identified as having a Toll-Free '888' number set-aside for you by CBLD. This number is not active, but may correspond to an existing '800' number currently in use by your organization.

Pursuant to an Order by the Federal Communications Commission dated May 15, 1998, all Interexchange carriers, including CBLD, are required to release these set-aside 888 numbers for activation and customer use, or place unwanted numbers into 'spare' status for use by other Toll-Free subscribers.

In order to fulfill our obligation to the FCC, CBLD is hereby informing you of your right of first refusal. If you wish to retain for your use the 888 number(s) designated below, please indicate as such in the appropriate box below. Should you wish to release the 888 number(s) into spare status, please mark accordingly. Note: Customers retaining the number(s) for their use will incur a monthly fee of \$7.50 per 888 number. Releasing the number(s) into spare status will make them available to other subscribers.

Please complete and sign the section below and return it to CBLD (fax or mail) by September 10, 1998. A special fax line (513.357.3001) has been established for your convenience. CBLD will then process the 888 number(s) in accordance with your response. Instructions to retain the 888 number(s) will result in activation of such number(s) in approximately 60 working days. Failure to respond to this notification will result in the set-aside number being released into spare status.

We appreciate your prompt response and look forward to serving all your Toll-Free service needs in the future.

Sincerely,

CBLD Toll-Free Services

Account Number: xxxxxx

Customer Name (printed): xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

Signature: _____

(check one)

☐ I wish to retain for my organization's use the 888 number(s) listed below. I understand that I will incur a monthly fee of \$7.50 per 888 number.

☐ I do not want to retain the below 888 number(s) for my organization's use. I understand that releasing the 888 number(s) into spare status may result in other subscribers using the number(s).

1st 888 no.	2nd 888 no.	3rd 888 no.	4th 888 no.	5th 888 no.
6th 888 no.	7th 888 no.	8th 888 no.	9th 888 no.	10th 888 no.
11th 888 no.	12th 888 no.	13th 888 no.	14th 888 no.	

Fax to: CBLD 888 Reserve Processing at 513.357.3001

Mail to: CBLD 888 Reserve Processing, 36 E. Seventh Street Suite 2300, Cincinnati, OH 45232

SMS/800

Management Team

6 Corporate Place • Piscataway, NJ 08854-4157
732-699-2100 • Fax 732-336-3295

June 1, 1998

To: All Responsible Organization (Resp Org) Primary Contacts**Re: Plans for the Release of Protected 888 Vanity Numbers**

The purpose of this letter is to provide you additional information associated with the process for the release of the protected 888 vanity numbers, as ordered by the Federal Communications Commission (FCC) in its Orders dated March 31, 1998 and subsequently modified on May 15, 1998. Please share this information with all of the affected parties within your organization.

- 1) The FCC expects a signed document associated with every 888 number. No e-mail message or other correspondence that does not have a legible signature will be processed. The document must be from the subscriber whenever the number is to be reserved for the subscriber's own use, or in those cases where the subscriber does not want the number. The documentation must be from the Resp Org in cases where the subscriber could not be reached, the subscriber failed to respond, or the matching 800 number is not assigned to a subscriber.

Resp Org certification of no subscriber response must include subscriber contact information, containing at least the name, address, and phone number of the subscriber and the date and means by which the Resp Org notified the subscriber of the right of first refusal.

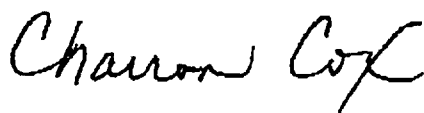
- 2) The required documentation should consist of two parts:
 - a) A diskette from the Resp Org, in the same format as the Microsoft Excel spreadsheet that was distributed on April 9th, and
 - b) A clear, legible copy of an authorization letter, from either the subscriber or the Resp Org as identified above, in Item 1, associated with each 888 number identified on the diskette. (No faxes will be accepted.)
- 3) The diskette can serve as the required Resp Org authorization for processing. No additional Resp Org documentation need be provided with the exception of:
 - a) Cases where the 888 number involved is for internal use by the Resp Org, in which case the Resp Org must provide a letter acknowledging they are the subscriber for this number and stating whether they want the number reserved or made available, or

- b) Cases where numbers are to be spared and no subscriber letter is available, as identified in Item 1 above.
- 4) In cases where either the Resp Org or the subscriber has multiple 888 numbers involved in the process, a single signed letter of authorization may be submitted covering all numbers.
- 5) Diskettes and attached documentation may be sent as early as the Resp Org completes. However, the file will not be processed until July 20, 1998. If your subscriber is interested in a number and has provided appropriate documentation, please place an "x" in the RESERVE column. If the subscriber is not interested in a number or you did not receive a response from the subscriber, please place an "x" in the SPARE column. Please ensure to include appropriate documentation associated for the disposition of the numbers.
- 6) The address to which the materials should be sent is:
- Database Service Management, Inc.
C/o SMS/800 Help Desk
1721 South Sykes Street
Bismarck, ND 58504
- Resp Orgs may want to consider using over-night mail services with a return receipt requested.
- 7) Partial files from Resp Orgs will be processed so long as the diskette and the associated documentation match. That is, every number on the partial file must have the anticipated action [reserve or spare] identified and the necessary paperwork attached. Do not send diskettes without the associated paperwork for each included 888 number attached.
- 8) To manage the assignment of numbers in an orderly manner, the following schedule will be implemented:
- a) Files and documentation will be verified on a first come first serve basis, beginning on Monday, July 20, 1998.
- b) Once the files and the documentation are verified, a notification will be provided to respective Resp Orgs with information about the exact date their files are scheduled for processing in the SMS/800 system.
- c) Resp Org files that are verified by Friday will be processed in the SMS/800 system no later than the following Wednesday.

- 9) Upon successful completion of the processing of your files, those numbers with correct documentation and criteria will be placed in "assigned" status with a pending date of 20 days in the future. Per FCC Order, you are required to complete activation of these assigned numbers as "working" within 20 days thereafter, no later than September 30, 1998.
- 10) For each 888 number you submit for processing, you will be provided a disposition report which will identify whether a number was "assigned" or "spared" or held in "unavailable" status due to an error condition. Explanation for error conditions will also be provided on the report. Resp Orgs will have an opportunity to correct the error conditions and resubmit those numbers with appropriate documentation for further processing.
- 11) Under the terms of the FCC Order, those set-aside 888 numbers for which subscribers did not respond or could not be assigned or spared due to error conditions or incomplete documentation, will be retained in "unavailable" status. Please note that these numbers will be subject to an FCC audit after September 10, 1998.
- 12) All subscriber and Resp Org documentation received by DSMI by August 21, 1998 will be processed by September 10, 1998.

The SMS/800 Management Team is committed to assisting you in managing this important activity and your cooperation in following the procedures outlined above will help assure our collective ability to comply with the terms of the FCC Order. If you have questions regarding this letter, please contact us at 888-SMS-3300 (Option 3).

On behalf of the SMS/800 Management Team,



Charron Cox
SMS/800 Services